Return to
Index

From: Jacob Odekirk
To: Johansen, Amy
Cc: McFadden, Kelly; Hardesty, Doug; McAlpine, Jerrold; Kyle Heitkamp; Thomas Mosher; Meyer, Dan
Subject: RE: Pre-draft PotlatchDeltic LK-6 Minor NSR and PSD Permits and Support Documents
Date: Friday, January 08, 2021 2:33:10 PM

Ms. Johansen,

Thank you for providing us with the pre-draft mNSR and PSD permit documents for review and comment. Suggested changes are provided below.

Draft PSD Permit Comments

- Table 1-1 Title should be changed to "Emission Units and Control Devices~~/Work Practices~~" to reflect EPA removing work practices from the table heading (3rd column.)

- Condition 3.2 should be revised to reflect that the maximum set point temperature of 245F is for exiting air temperature.

- Conditions 3.5 and 4.1.5.2 need to be revised to address our comments provided to EPA Region 10 on July 31, 2020 on the draft permit condition language. The Kiln 6 drying schedules have multiple set points over the course of drying a batch of lumber (i.e., the set point temperature increases over the lumber drying time.) Similar to the required moisture content monitoring, this new permit condition needs to account for time at the beginning of the drying schedule where zones in the kiln may have actual temperatures higher than the initial drying schedule set points, but it does not indicate the kilns is malfunctioning or over-drying lumber. For example, if the initial drying temperature set point is 70 F it is possible to have actual kiln-zone temperatures higher than that set point at the beginning of the run. However, this does not indicate the kiln is malfunctioning and requires corrective action. PotlatchDeltic requests the temperature differential-related permit condition reflect the maximum temperature set point of the drying schedule.

  Proposed Revisions

  Condition 3.5. *The permittee shall take corrective action to return the actual temperature to the set point temperature if the instantaneous dry bulb temperature of heated air that exits any load of lumber in any zone of the kiln as measured pursuant to Condition 4.1.5.2 exceeds the maximum set point temperature in the drying schedule by more than 20°F. The entire duration of each exceedance of the 20°F temperature differential threshold shall be considered one permit deviation.*

  Condition 4.1.5.2. *For each load of lumber in each zone of the kiln, calculate the instantaneous temperature differential by subtracting the set point temperature in the drying schedule from the dry bulb temperature of the heated air that exits the load of lumber. Record each temperature differential that exceeds 20°F of the maximum set point temperature in the drying schedule and the corrective action taken to resolve the exceedance.*

Draft mNSR Comments

- Page 8 of the mNSR Permit Analysis document incorrectly describes the PM2.5 NAAQS evaluation supporting the June 2019 permit. The mNSR Permit Analysis document states, "And in order to avoid "double counting" the impacts from the source's existing emissions, only the project's emissions increases were modeled." EPA's statement is not accurate because PotlatchDeltic modeled a much more conservative emission increase of potential allowable emissions compared to the 98th percentile actuals. PotlatchDeltic has explained to EPA several times that the daily actual PM2.5 emissions from the sawmill and the planer mill will not increase as a result of the Kiln 6 project. Most sawmill and planer mill equipment were evaluated as operating for 24 hour per day, which is higher than physically possible due to required daily equipment maintenance. Similarly, PotlatchDeltic evaluated a much more conservative PM2.5 modeling analysis that evaluated allowable emission increases from the boilers (assuming continuous daily operation) compared to current actual emissions. The Project emission increases are much less than the allowable emission increases that were modeled.

- Table 1-1 Title should be changed to "Emission Units and Control Devices~~/Work Practices~~" to reflect EPA removing work practices from the table heading (3rd column.)

- Condition 3.2 should be revised to reflect set point temperature of 245F is for exiting air temperature.

- Table 3-3 (Annual PM2.5 Emission Limits) includes EPA's updated limits for Baghouse 2 (PCWR-PM-SH) and Baghouse 3 (PCWR-PM-SD). EPA made to two adjustments to the annual PM2.5 emission limit. First, EPA updated the PM2.5 emission factor for each baghouse based on the recent source testing. Second, EPA used the updated daily PM2.5 emission limits and limited operation to 312 days per year. The resulting annual PM2.5 emission limits for Baghouse 2 and Baghouse 3 are lower than the allowable PM2.5 annual emission increases that PotlatchDeltic modeled and showed annual PM2.5 NAAQS compliance. EPA's methodology of revising the annual PM2.5 emission limits places an unnecessary restriction on PotlatchDeltic by limiting allowable emissions from the two baghouses below the modeled allowable emission increases.

Baghouse ID	**Modeled Annual PM2.5 Emissions with EPA Emission Factor Adjustments (tpy)**	**EPA-Calculated PM2.5 Emission Limit (tpy)**
BH2	1.6244	1.0187
BH3	1.4453	0.9012

PotlatchDeltic requests EPA revise the annual PM2.5 emission limits for Baghouse 2 and Baghouse 3 to be based on the modeled PM2.5 emissions.

- Conditions 3.4 and 4.2.7.2 need to be revised to address our comments provided to EPA Region 10 on July 31, 2020 on the draft permit condition language. The Kiln 6 drying schedules have multiple set points over the course of drying a batch of lumber (i.e., the set point temperature increases over the lumber drying time.) Similar to the required moisture content monitoring, this new permit condition needs to account for time at the beginning of the drying schedule where zones in the kiln may have actual temperatures higher than the initial drying schedule set points, but it does not indicate the kilns is malfunctioning or over-drying lumber. For example, if the initial drying temperature set point is 70 F it is possible to have actual kiln-zone temperatures higher than that set point at the beginning of the run. However, this does not indicate the kiln is malfunctioning and requires corrective action. PotlatchDeltic requests the temperature differential-related permit condition reflect the maximum temperature set point of the drying schedule.

  Proposed Revisions

  Condition 3.4. *The permittee shall take corrective action to return the actual temperature to the set point temperature if the instantaneous dry bulb temperature of heated air that exits any load of lumber in any zone of the kiln as measured pursuant to Condition 4.2.7.2 exceeds the maximum set point temperature in the drying schedule by more than 20°F. The entire duration of each exceedance of the 20°F temperature differential threshold shall be considered one permit deviation.*

  Condition 4.2.7.2. *For each load of lumber in each zone of the kiln, calculate the instantaneous temperature differential by subtracting the set point temperature in the drying schedule from the dry bulb temperature of the heated air that exits the load of lumber. Record each temperature differential that exceeds 20°F of the maximum set point temperature in the drying schedule and the corrective action taken to resolve the exceedance.*

Thanks,

Jacob Odekirk
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From: Johansen, Amy <Johansen.Amy@epa.gov>
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Subject: Pre-draft PotlatchDeltic LK-6 Minor NSR and PSD Permits and Support Documents

[External Email] – Exercise caution with links and attachments.

Jacob,

Region 10 has prepared revisions to the minor NSR permit authorizing construction of LK-6. A pre-draft minor NSR permit and Permit Analysis are attached for your review. I've also attached the pre-draft PSD permit and Fact Sheet, given that we intend to process both permits simultaneously. Please provide any input you may have, on either permit, by Friday January 8. After considering your input, Region 10 intends to proceed to a public comment period with revisions to both the minor NSR and PSD permits.

During our call on Tuesday December 15, PotlatchDeltic expressed concern about the time and expense of permit revisions and whether Region 10 would be revising the emission limits in the minor NSR permit every time source testing produces a different emission factor. We appreciate and understand this concern. Permit revisions are resource intensive for Region 10, as well. As explained in the attached Permit Analysis, we do not anticipate the need to revise the 24-hour or daily $PM_{2.5}$ NAAQS-protective emission limits, based upon testing that was not required in the minor NSR permit to verify the emission factors.

If you have any questions, please don't hesitate to reach out to the project lead, Dan Meyer, at 206.553.4150 or meyer.dan@epa.gov.

Happy Holidays.
Amy

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